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June 8, 2007

**BY HAND**

Hon. Judith G. Dein  
U.S. Magistrate Judge  
United States District Court  
District of Massachusetts  
1 Courthouse Way  
Boston, Massachusetts 02210

Re: Waters v. Town of Ayer et al., No. 04 Civ. 10521 (GAO)(JGD)

Dear Judge Dein:

Pursuant to your order of May 23, 2007, plaintiff now submits documents from the criminal defense files that were generated prior to August 12, 1987 (when the Supreme Judicial Court denied rehearing after affirming Mr. Waters's conviction) for which Plaintiff claims privilege, along with a brief for the Court's *in camera* consideration. For ease of reference, a privilege log of the documents presented is also enclosed, and we have highlighted responsive lines in any document in which there is additional material that does not fall under the Court's order.

In our close review of these files we identified a two-page document (D000817-18) which was erroneously withheld. That document has now been disclosed to counsel.

Thank you for your consideration.

Respectfully submitted,

  
Deborah L. Cornwall

enclosures

cc: Jay Tehan, Esq. (all w/o enclosures, via ECF, email and U.S. mail)  
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